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perjury.

2. The supplement provides the inadvertently omitted declaration under penalty of perjury for the Darrell Bryan declaration. It also provides a declaration from Walter Stone, President of American Aviation, Inc., the company that provided the tower estimate. The declaration addresses the question of Mr. Stone's expertise in tower construction raised by SBH in its reply by pointing out that he has been a Rohn Tower Company distributor since 1978 and has constructed towers throughout the southeast. Finally, the supplement provides a letter from Hall Electronics addressing the question of whether the prices for certain items of equipment are for new or used equipment. The letter states that all items in its proposal are new "unless shown as 'used'".

3. Although additional pleadings are not normally accepted beyond the standard pleading cycle, it is submitted that the Bryan supplement should be accepted because SBH makes a serious allegation to which Bryan has not had an opportunity to respond. SBH asserts that Mr. Stone has "no expertise upon which to base a quote", and refers to the Stone tower quotation as a "ploy" because "it appears that Mr. Stone may well have simply been doing Bryan a favor by preparing baseless 'quotes' solely for the purposes of supporting Bryan's Opposition". It would be patently unfair to allow SBH to besmirch the reputation of Mr. Stone with baseless insinuations. In addition, SBH asserts (paras. 24-25) that the Hall Electronics estimate is for used, reconditioned equipment. The Hall Electronics letter submitted with the supplement makes it clear that any used equipment on the earlier list was clearly marked and that all others are new.


4. Acceptance of the supplement will permit Mr. Stone to respond to the charge

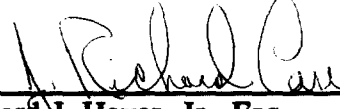
that he has engaged in a "ploy" to deceive the Commission, and the proffered documents will be of assistance to the Presiding Judge by clarifying the record. Further, acceptance of the brief supplement will not delay the progress of the hearing in view of the implementation of the comparative hearing "freeze".

Wherefore, in view of the foregoing, it is respectfully submitted that there is good cause for acceptance of the Bryan Supplement to Opposition to Second Petition to Enlarge Issues.

Respectfully submitted,

DARRELL BRYAN

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April 18, 1994

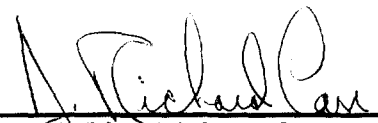
CERTIFICATE OF SERVICE

I, J. Richard Carr, hereby certify that copies of the foregoing "Motion for Acceptance of Supplement to Opposition to Second Motion to Enlarge Issues" were sent via first class mail, postage prepaid, or as otherwise indicated to each of the following on this 18th day of April 1994:

The Hon. John M. Frysiak*
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* Hand Delivery